

INTERNATIONAL GOLDEN FOODS,)
INC., an Illinois corporation,)
)
)
Plaintiff,)
)
vs.) Case No. 10 CV 906
)
)
SOYYIGIT GIDA SANAYI VE)
TICARET ANONIM SIRKETI, and)
SOYYIGIT GROUP)
)
Defendants.)

MOTION FOR LEAVE TO FILE AMENDED COMPLAINT

NOW COMES the Plaintiff, INTERNATIONAL GOLDEN FOODS, INC., an Illinois corporation, by and through its Attorney, Joseph M. Williams, and for its Motion for Leave to File its Amended Complaint, states as follows:

1. That the Complaint was filed on June 18, 2010.
2. That since the filing of the Complaint, Plaintiff's (hereinafter "IGF") former counsel, Elizabeth Schoettly (hereinafter "Schoettly"), had refused to provide or return boxes of documents sought by IGF.
3. Recently, Schoettly has agreed to assist both IGF and its present counsel, in this cause.
4. That a box of documents, writings, pleadings and communications were received on November 26, 2010.
5. That a preliminary review of those documents evidences substantial amounts of information that require repleading, for example, a copy of the signed written agreement between Schoettly and the Defendant.
6. That Rule 15(a)(2), provides:

Rule 15. Amended and Supplemental Pleadings
(a) Amendments before a trial

(2) Other Amendments In all other cases, a party may amend its pleading only with the opposing party's written

7. That the parties are not at issue and no prejudice will be created to Defendants by so permitting.
8. That Schoettly shall also be added as a party Plaintiff to this cause.
9. That the Amended Complaint is being sought to be filed in lieu of a response to the pending Motion to Dismiss.
10. That the Amended Complaint will be available on or before December 15, 2010

WHEREFORE, Plaintiff, INTERNATIONAL GOLDEN FOODS, INC., prays this Court grant it leave to file its Amended Complaint, in lieu of a response to Defendant's Motion to Dismiss, on or before December 15, 2010.

Respectfully submitted,

By: _____ /s/ Joseph M. Williams
Joseph M. Williams

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